

Dean Gazzo Roistacher LLP  
Lee H. Roistacher, Esq. (SBN 179619)  
440 Stevens Avenue, Suite 100  
Solana Beach, CA 92075  
Telephone: (858) 380-4683  
Facsimile: (858) 492-0486  
E-mail: [lroistacher@deangazzo.com](mailto:lroistacher@deangazzo.com)

Attorneys for Defendants  
State of California by and through California  
Highway Patrol and Officer Ramon Silva

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN AND  
CARLOS ALANIZ,  
INDIVIDUALLY AND AS  
SUCCESSORS-IN-INTEREST TO  
JOHN ALANIZ, DECEASED,

Plaintiff,

v.

STATE OF CALIFORNIA;  
RAMON SILVA; AND DOES 1-10,  
INCLUSIVE,

Defendant.

Case No.: 2:23-cv-07532-DMG-SSC

**DECLARATION OF LEE H.  
ROISTACHER IN SUPPORT OF  
DEFENDANTS STATE OF  
CALIFORNIA BY AND THROUGH  
CALIFORNIA HIGHWAY PATROL  
AND OFFICER RAMON SILVA'S  
MOTIONS IN LIMINE NOS. 1-4**

Courtroom: 8C  
Judge: Hon. Dolly M. Gee

FPTC: March 25, 2025, 2:00 p.m.

Trial Date: April 15, 2025, 8:30 a.m.

I, Lee H. Roistacher, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am also a partner in the law firm of Dean Gazzo Roistacher, LLP, attorneys of record for defendants State of California by and through California Highway Patrol and Officer Ramon Silva in this matter. I have personal knowledge of the following facts, and if called to testify with respect thereto, would do so competently.

///

///

2. Exhibit 1 is a true and correct copy of Federal Rule of Civil Procedure 26 (a) (2) (B) Report by Scott A. DeFoe. He prepared no supplemental report. He was not deposed.

3. Exhibit 2 is a true and correct copy of Autopsy Report.

4. Exhibit 3 is a true and correct copy of Federal Rule of Civil Procedure 26 (a)(2 (B) Report by Bennett I. Omalu. MD, MBA, MPH, CPE, DABP-AP, CP, FP, NP. He prepared no supplemental report. He was not deposed.

5. Exhibit 4 is a true and correct copy of paramedic records.

6. Exhibit 5 is a true and correct copy of hospital records.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 14, 2025.

/s/ Lee H. Roistacher

Lee H. Roistacher, declarant